

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

JOHN HILL, Individually and On Behalf of All
Others Similarly Situated,

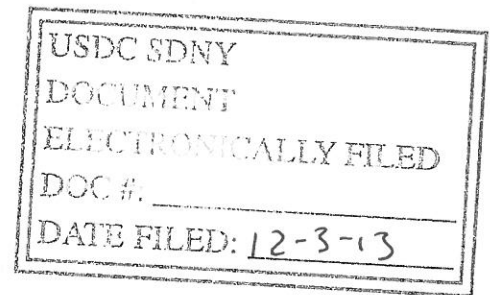
Plaintiff,

vs.

CHINA-BIOTICS, INC., SONG JINAN, LI CHI
YUEN a/k/a RAYMOND LI, LEWIS FAN, YAN
YIHONG a/k/a EVA YAN, and TRAVIS CAI,

Defendants.

Civil Action No. 10-CV-7838-PAC



STIPULATION AND PROPOSED ORDER

WHEREAS, on January 9, 2012, plaintiffs John Hill and Nureddin Nejim ("Plaintiffs")
filed a Second Amended Complaint;

WHEREAS, on October 18, 2012, the Court consolidated the above-captioned case with
Casper v. Jinan, 12-cv-4202 (S.D.N.Y.);

WHEREAS the parties participated in a second mediation session on July 17, 2013;

WHEREAS, on September 27, 2013, the Court "So Ordered" a stipulation, which
required the Plaintiffs to file a consolidated amended complaint by December 1, 2013 if the case
did not settle before then;

WHEREAS the parties have reached an agreement in principle to resolve the action and
are in the process of preparing the appropriate documents necessary to finalize the settlement;
and

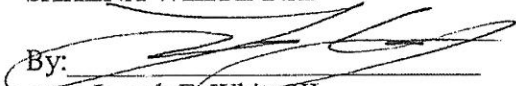
WHEREAS, once the appropriate settlement documents are finalized and executed by the
parties, the parties will move the Court for preliminary approval of the settlement.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned
counsel for the parties, that:

1. The above-referenced action is stayed in all regards pending the finalization of papers documenting the settlement and the filing of a motion for preliminary approval of the settlement.

Dated: November 29, 2013

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Liaison Counsel for Plaintiffs

RYAN & MANISKAS, LLP

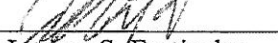
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Counsel for Plaintiffs

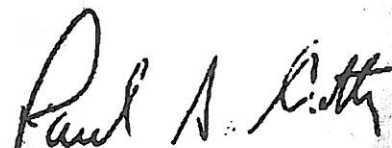
SO ORDERED:

Dated: 12-3-3

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Attorneys for Defendants China-Biotics, Inc.



Honorable Paul A. Crotty
United States District Judge

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